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September 6, 2005

FDIC San Francisco Regional Office Director Johns F. Carter 25 Jessie Street at Ecker Square Suite 2300 San Francisco, CA 94105

RE: Walmart's Application for Deposit Insurance

Regional Director Johns F. Carter:

Our \$130 million community bank is located in northwest Kansas with offices in Norton, Plainville, and Hill City, Kansas. The population of each of these communities is less than 3,000 and we are located in rural agricultural communities. Yet, each community has a Walmart within its immediate area and our customers regularly shop in these stores. The stores have already negatively impacted our local grocery and retail stores and now they have the potential of 'killing' our local financial institutions. Without a strong banking institution our communities will slowly evaporate from a lack of capital.

In our area, deposits are severely limited. We are dealing with an aging deposit base and as the depositors pass away, the deposits are withdrawn from our bank and communities. Area banks are already paying excessive deposit rates in order to fund their loan portfolios. If Walmart is allowed to receive FDIC insurance, we will see an increased drain on our local deposits. We simply cannot compete with their size and economies of scale. If our banks are not able to maintain their local deposit base, they will not be able to survive. If our banks cannot survive, our communities will rapidly become 'ghost towns'.

Our bank takes great pride in supporting and reinvesting into its communities. We have an outstanding CRA rating and a high loan to deposit ratio. Walmart has no interest in the success or stability of our communities. Yet, if they obtain FDIC insurance they will not hesitate to drain our local deposits and place them in investments outside our trade areas. Where will we find the deposits to loan to our area farmers and businesses? Simply put, we won't be able to replace the deposits and our communities will be

deprived of the capital they need to grow and prosper. I urge you to **DENY** Walmart's request for FDIC insurance.

Thank you for your time and consideration.

Sincerely,

John P. Engelbert

President